

REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested.

Applicant has made the correction to the misspelling in claim 68, and as such all rejections to form have been addressed.

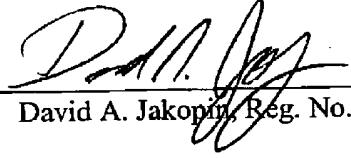
Claims 65-70 are rejected under 35 USC 102(b) as being anticipated by Kamikawa et al. Claims 71-72 are rejected under 35 USC 103(a) as being unpatentable over Kamikawa et al. and further in view of Schild et al. Claims 79-80 and 82-88 are rejected under 35 USC 102(e) as being anticipated by Ting et al. Claims 65-67, 69 and 72-78 are rejected under 35 USC 103(a) as being unpatentable over Kamikawa et al. and further in view of Ting et al. Applicant has amended the independent claims and, as amended, submits that they are in a condition for allowance.

In particular, independent claims 65 and 79 have been amended to recite that only the moveable guard positioned between the upper/second chamber and the lower/first chamber is used to prevent liquid from entering the lower/first chamber when such liquid is used during processing in the upper/second chamber. Neither Kamikawa or Ting teach or suggest such a structure. Ting uses a workpiece holder and gas in attempting to prevent liquid introduced in the upper chamber from being introduced into the lower chamber. Kamikawa has no provision for using a liquid in the upper chamber at all. Accordingly these claims, and the claims dependent thereon, are allowable.

With respect to claim 68, this claim has been amended to explicitly recite that the first processing step takes place in the upper section with the moveable guard positioned between the upper and lower section and uses a liquid, and the second processing step, which follows the first processing step, then takes place. Kamikawa only suggests using the upper chamber after processing in the lower chamber, and does not teach or suggest using a liquid in the first processing step in the upper section. Further, dependent claim 89 has been added and recites a third processing step that follows the second processing step, which further illustrates the distinction with Kamikawa.

In view of the foregoing and because all objections and rejections have been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited. If any points remain in issue which the Examiner believes may best be resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,
PILLSBURY WINTHROP LLP

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Reply to Customer No. 27498

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